

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

Carlos Javier Correa-Oppenhimer, Carlos A.  
Correa-Rodríguez, and Sandybel  
Oppenhimer-Arroyo,

Plaintiffs,

v.

Frank Higginbotham, CFK Sports, Inc.  
(Register No. 312097), and Sadi R.  
Antonmattei-Goitia,

Defendants.

Case No. 17-02289-ADC

TRADEMARK INFRINGEMENT;  
DAMAGES; DECLARATORY JUDGMENT;  
BREACH OF CONTRACT

**JURY TRIAL DEMANDED**

**NOTICE OF VOLUNTARY DISMISSAL WITH PREJUDICE**

TO THE HONORABLE COURT:

COME NOW Carlos J. Correa-Oppenhimer (“Correa-Oppenhimer”), Carlos A. Correa-Rodríguez (“Correa-Rodríguez”), and Sandybel Oppenhimer-Arroyo (“Oppenhimer”, jointly “Plaintiffs”), through the undersigned attorneys, and very respectfully STATE, ALLEGE, and PRAY as follows:

1. The parties have agreed to move for voluntary dismissal with prejudice of all their claims and potential counterclaims in the instant case, subject to the terms and conditions of a confidential settlement agreement.

2. Accordingly, the appearing parties request, pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, that the present case be dismissed with prejudice and without the imposition of attorneys’ fees, costs and/or interests.

**WHEREFORE**, Plaintiffs respectfully request this Honorable Court, that pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, the present case be dismissed with prejudice and

without the imposition of attorneys' fees, costs and/or interests and that the Judgment be issued accordingly.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, on this 18th day of September of 2018.

**CERTIFICATE OF SERVICE**

WE HEREBY CERTIFY that on this same date a copy of this motion was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys who have filed appearances in this case.

**SEPULVADO, MALDONADO & COURET**

**Attorneys for Plaintiffs**

304 Ponce de León Ave.

Suite 990

San Juan, PR 00918

Telephone: (787) 765-5656

Facsimile: (787) 294-0073

/s/ Lee R. Sepulvado Ramos

Lee R. Sepulvado Ramos

USDC-PR 211912

lsepulvado@smclawpr.com

/s/ Albéniz Couret Fuentes

Albéniz Couret Fuentes

USDC-PR 222207

acouret@smclawpr.com

/s/ Aníbal J. Núñez González

Aníbal J. Núñez González

USDC-PR 230101

anunez@smclawpr.com